

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

Case: 2:20-cr-20607  
Judge: Parker, Linda V.  
MJ: Whalen, R. Steven  
Filed: 12-16-2020 At 11:30 AM  
INDI USA V. PROE (DA)

D-1 CHRISTOPHER PROE,

Defendant.

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

*(18 U.S.C. §922(g)(1) - Felon in possession of a firearm)*

D-1 CHRISTOPHER PROE

That on or about November 5, 2020, in the Eastern District of Michigan, Southern Division, the defendant, CHRISTOPHER PROE, knowing that he had been convicted of a crime punishable by a term of imprisonment exceeding one year, a felony offense, did knowingly and unlawfully possess a firearm, to-wit: one Smith & Wesson, Model: SD40VE, .40 caliber pistol, which was manufactured outside the State

of Michigan and thus traveled in interstate or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

**FORFEITURE ALLEGATIONS**

*(18 U.S.C. § 924(d) and 28 U.S.C. § 2461)*

The above allegations contained in this Indictment are hereby incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d), together with Title 28, United States Code, Section 2461(c).

Upon conviction of the offense(s) alleged in this Indictment, Defendant CHRISTOPHER PROE shall forfeit to the United States any firearm and ammunition involved in or used in the knowing commission of the offense(s), including, but not limited to, a Smith and Wesson, .40 caliber pistol and ammunition, holster, gun box, and replica ATF badge,

*[Space left intentionally blank.]*

pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

**THIS IS A TRUE BILL.**

*s/Grand Jury Foreperson*  
GRAND JURY FOREPERSON

MATTHEW SCHNEIDER  
United States Attorney

MATTHEW A. ROTH  
Chief, Major Crimes Unit

*s/Jeanine Brunson*  
JEANINE BRUNSON  
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Dated: December 16, 2020

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**NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.**

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <u>BYL for B</u>

**Case Title:** USA v. CHRISTOPHER PROE

**County where offense occurred : Wayne**

**Check One:**  **Felony**  **Misdemeanor**  **Petty**

Indictment/  Information --- no prior complaint.  
 Indictment/  Information --- based upon prior complaint [Case number: 20-mj-30468]  
 Indictment/  Information --- based upon LCrR 57.10 (d) [*Complete Superseding section below*].

## **Superseding Case Information**

**Superseding to Case No:** \_\_\_\_\_ **Judge:** \_\_\_\_\_

- Corrects errors; no additional charges or defendants.
- Involves, for plea purposes, different charges or adds counts.
- Embraces same subject matter but adds the additional defendants or charges below:

**Defendant name** **Charges** **Prior Complaint (if applicable)**

**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

December 16, 2020  
Date

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Assistant United States Attorney  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.